

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE BANKRUPTCY MATTER OF:

Eileen Abat

Debtor

Chapter 13 No. 18-14673

Judge LaShonda A. Hunt

OBJECTION TO CONFIRMATION OF PLAN

Arvest Central Mortgage Company, (“Movant”), through its attorneys, Kluever & Platt, LLC, files this, its Objection to Confirmation of Plan, (“Objection”) and in support thereof, states the following as Movant’s:

1. Debtor filed the instant Bankruptcy case on 5/21/2018.
2. This Court has jurisdiction over this Objection as this Objection is a core proceeding.
3. Movant is the holder of the note secured by a mortgage on the property commonly known as 432 Elder Court, Glenview, IL 60025, (“the Subject Property”).
4. Arvest Central Mortgage Company is the servicing agent for Movant.
5. Movant’s pre-petition arrears claim is \$719.13.
6. Debtor's Chapter 13 Plan of Reorganization, (the “Plan”), provides that the Trustee disburse the sum of \$0.00 to cure Movant’s pre-petition arrears claim.
7. Accordingly, the Plan impermissibly modifies the rights of the Movant to receive all funds due it, thereby violating 11 U.S.C. § 1322(b)(2) and 11 U.S.C. § 1322(b)(5).

WHEREFORE, Movant requests this Court enter an Order denying confirmation of the Plan and for such other relief as the Court Deems just.

Arvest Central Mortgage Company

/s/ Ross T. Brand

Ross T. Brand ARDC# 6294886

Counsel for Movant

Date: 5/31/2018

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